

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE
INNOVATION

Plaintiff,

vs.

MAURA HEALEY, ATTORNEY GENERAL
OF THE COMMONWEALTH OF
MASSACHUSETTS in her official capacity,

Defendant.

C.A. No. 1:20-cv-12090-DPW

JOINT STIPULATION

Plaintiff Alliance for Automotive Innovation (“Auto Innovators”) and Non-Party Auto Care Association (“ACA”) hereby agree to the following stipulation:

1. On January 11, 2023, Auto Innovators served upon ACA a Subpoena to Testify at a Deposition in a Civil Action (“Subpoena”) requesting, *inter alia*, that a corporate representative of ACA appear for a deposition pursuant to Federal Rule of Civil Procedure 30(b)(6) to testify about Topics 1-4 identified in the Subpoena.
2. On February 1, 2023, ACA filed its Motion for Protective Order [ECF No. 321] objecting to the Subpoena. On February 15, 2023, Auto Innovators filed its Opposition to ACA’s Motion for a Protective Order [ECF No. 324].
3. Auto Innovators withdraws its request for a Federal Rule of Civil Procedure 30(b)(6) deposition of ACA and ACA withdraws its pending Motion for Protective Order. ACA agrees that it shall make Aaron Lowe available for a fact deposition on or before March 24, 2023 at a mutually agreeable time and place, and that such deposition shall be limited to Topics 1-4 of the Subpoena.

Respectfully submitted,

PLAINTIFF ALLIANCE FOR
AUTOMOTIVE INNOVATION,

AUTO CARE ASSOCIATION,

By its attorneys,

By its attorneys,

s/ Daniel D. Queen per email approval 2/22/2023

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CERTIFICATE OF SERVICE

I certify that on February 22, 2023, a true copy of this document will be sent electronically by the ECF system to attorneys of record identified on the Notice of Electronic Filing.

s/ Steven A. Block

Steven A. Block